

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<p>In re:</p> <p>NATIONAL FORGE COMPANY, <i>et al.</i>,</p> <p style="text-align: center;">Debtor.</p> <p>-----</p> <p>OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF NATIONAL FORGE COMPANY,</p> <p style="text-align: center;">Plaintiff,</p> <p>and</p> <p>OFFICIAL COMMITTEE OF RETIREES OF NATIONAL FORGE COMPANY,</p> <p style="text-align: center;">Intervenors,</p> <p>v.</p> <p>E. ROGER CLARK, both Individually and as an Officer and Director of National Forge Company, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p> <hr/>	<p>Civil No. 04-21 Erie</p>
--	-----------------------------

Joinder of Daniel Antos, William D. Bailey, Richard A. Brewster, James E. Caldwell, Larry Campbell, James C. Confer, Richard D'Alessandro, Donald Fissel, James B. Harris, Thomas H. Jackson, Ashok K. Khare, Carl J. Luppino, Clarence E. Mason, Harold Murphy, Philip R. Novosel, Charles R. Olson, James D. Ruhlman, Phillip R. Simons, Glenn E. Turk, Ronald L. Young and Barry Zischkau in the Motion for Summary Judgment and Opening Brief of Defendants E. Roger Clark, Maurice J. Cashman, Dana Beyeler and Robert A. Kaemmerer

Daniel Antos, William D. Bailey, Richard A. Brewster, James E. Caldwell, Larry Campbell, James C. Confer, Richard D'Alessandro, Donald Fissel, James B. Harris,

Thomas H. Jackson, Ashok K. Khare, Carl J. Luppino, Clarence E. Mason, Harold Murphy, Philip R. Novosel, Charles R. Olson, James D. Ruhlman, Phillip R. Simons, Glenn E. Turk, Ronald L. Young and Barry Zischkau, (collectively “Transferee Defendants”) by and through their counsel, The McDonald Group, L.L.P., respectfully submit this Joinder in the Motion for Summary Judgment (the “Motion”) and Opening Brief in Support of the Motion (the “Brief”) and state as follows:

1. Transferee Defendants agree with the statements of fact, arguments and authorities set forth in the Motion and Brief.

2. Transferee Defendants assert that the arguments and authorities set forth in the Motion and Brief apply with equal force to the Transferee Defendants and, therefore, join in the Motion and the Brief.

3. Transferee Defendants submit an appendix in support of the Motion and Brief.

WHEREFORE, the Transferee Defendants respectfully request that the Court grant the relief requested in the Motion as to all Defendants, including the Transferee Defendants, and grant such other relief as the Court deems proper.

Respectfully submitted,

THE McDONALD GROUP, L.L.P.

By: /s/ Brian M. McGowan

James D. McDonald, Jr.

PA I.D. No. 06570

Brian M. McGowan

PA I.D. No. 73438

456 West Sixth Street

P.O. Box 1757

Erie, Pennsylvania 16507-0757

(814) 456-5318

Attorneys for:

Daniel Antos, William D. Bailey,

Richard A. Brewster, James E. Caldwell,

Larry Campbell, James C. Confer,

Richard D'Alessandro, Donald Fissel,

James B. Harris, Thomas H. Jackson,

Ashok K. Khare, Carl J. Luppino,

Clarence E. Mason, Harold Murphy,

Philip R. Novosel, Charles R. Olson,

James D. Ruhlman, Phillip R. Simons,

Glenn E. Turk, Ronald L. Young,

Barry Zischkau

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<p>In re:</p> <p>NATIONAL FORGE COMPANY, <i>et al.</i>,</p> <p style="text-align: center;">Debtor.</p> <p>-----</p> <p>OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF NATIONAL FORGE COMPANY,</p> <p style="text-align: center;">Plaintiff,</p> <p>and</p> <p>OFFICIAL COMMITTEE OF RETIREES OF NATIONAL FORGE COMPANY,</p> <p style="text-align: center;">Intervenors,</p> <p>v.</p> <p>E. ROGER CLARK, both Individually and as an Officer and Director of National Forge Company, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p> <hr/>	<p>Civil No. 04-21 Erie</p>
--	-----------------------------

CERTIFICATE OF SERVICE

I, Brian M. McGowan, do hereby certify that a true and correct copy of the foregoing Joinder was served by first class United States mail, postage prepaid, on this 18th day of July, 2005 upon each of the parties listed below:

John M. Steiner, Esquire
Leech Tishman Fuscaldo & Lampl, LLC
1800 Frick Building
Pittsburgh, PA 15219

Joel M. Walker, Esquire
Duane Morris LLP
600 Grant Street, Suite 5010
Pittsburgh, PA 15219

Lawrence C. Bolla, Esquire
Michael P. Kruszewski, Esquire
The Quinn Firm
2222 West Grandview Blvd.
Erie, PA 16506

William T. Cullen, Esquire
Kirpatrick & Lockhart, LLC
Henry W. Oliver Building
553 Smithfield Street
Pittsburgh, PA 15222

Douglas A. Campbell, Esquire
Campbell & Levine, LLC
1700 Grant Building, 310 Grant Street
Pittsburgh, PA 15219

Respectfully submitted,

THE McDONALD GROUP, L.L.P.

By: /s/ Brian M. McGowan
James D. McDonald, Jr.
PA I.D. No. 06570
Brian M. McGowan
PA I.D. No. 73438
456 West Sixth Street
P.O. Box 1757
Erie, Pennsylvania 16507-0757
(814) 456-5318

Attorneys for:
Daniel Antos, William D. Bailey,
Richard A. Brewster, James E. Caldwell,
Larry Campbell, James C. Confer,
Richard D'Alessandro, Donald Fissel,
James B. Harris, Thomas H. Jackson,
Ashok K. Khare, Carl J. Luppino,
Clarence E. Mason, Harold Murphy,
Philip R. Novosel, Charles R. Olson,
James D. Ruhlman, Phillip R. Simons,
Glenn E. Turk, Ronald L. Young,
Barry Zischkau